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October 19, 2022

**VIA ECF ONLY**

Hon. Robert W. Lehrburger, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1320  
New York, New York 10007

**Re: *Covet & Mane, LLC v. Invisible Bead Extensions, LLC***  
**Case No. 21-cv-07740-(JPC) (RWL)**

Dear Magistrate Judge Lehrburger:

Defendant/counterclaim plaintiff Invisible Bead Extensions, LLC (“IBE”) writes to the Court now in connection with Your Honor’s Rules for Redactions and Filing Under Seal (“Rules”). IBE recently filed its opposition to plaintiff’s motion for leave to amend its First Amended Complaint along with a declaration from the undersigned in support of its opposition. (ECF Nos. 144 and 145.)

Exhibit “E” to my declaration was originally marked by IBE as Attorneys’ Eyes Only pursuant to the parties’ So-Ordered Stipulated Confidentiality Order. (ECF No. 49.) IBE maintains that this exhibit should remain Attorneys’ Eyes Only in light of its content, which includes, among other things, the would-be individual defendants’ interest in Kitsune, Kitsune’s value as of the time of the document, and compensation to be paid to one of Kitsune’s then principals.

In further compliance with the Rules, an unredacted copy of Exhibit E is being filed approximately contemporaneously with this letter and being emailed to Chambers.

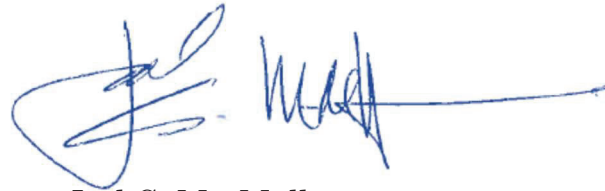
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**MB** MANDELBAUM  
BARRETT

Naturally, this office is available at the Court's convenience should it have any questions or concerns in connection with the enclosed document.

The Court's continued attention to this matter is appreciated.

Respectfully submitted,  
MANDELBAUM BARRETT PC



Joel G. MacMull


Encl.

cc: All Counsel of Record (*via ECF and email only*)

The application to seal is denied except as qualified as follows. The first three pages of Exhibit E appear to be a certificate of organization filed with the Department of Commerce for the State of Utah. That portion of the document may not be kept under seal. If the last two pages of the document also were filed with the State of Utah, they may not be kept under seal. If those two pages were not filed with the State of Utah or otherwise shared publicly, they may be kept under seal. Defendant shall file an appropriately revised Exhibit E by October 27, 2022.

**SO ORDERED:**

10/20/2022

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HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE